

REMARKS

I. Introduction

Claims 1-17 and 25-33 have been withdrawn from consideration. Claims 18-24 and 34-46 remain pending in this application. In view of the following remarks, it is respectfully submitted that all of the above-identified claims are allowable.

II. Claim Rejections - 35 U.S.C. 103

Claim 18-24 and 34-46 stand rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent Application 2002/0038235-a1 to Musafia et al. ("Musafia") in view of either the publication entitled "A PC-based Real Time Measurement System for Factory Automation on quality Control and Production Control" by Lin et al. ("Lin") or the publication entitled "Intelligent Monitoring System Used to Control Asynchronous Production Systems" by Szabados ("Szabados"). *Office Action*, Page 2.

Independent claim 18 recites "collecting real time equipment information from a production line." Numerous examples of equipment information are provided throughout the specification. *See, e.g., Specification, ¶¶ [0028] and [0036].* In general, the equipment information relates to parameters associated with the equipment which is on the production line, *e.g.*, production equipment. The Examiner, in rejecting claim 18, states that Musafia teaches this limitation by "at least the supply or equipment-related data collected from a production line and then stored in at least the materials and supply inventory database." *Office Action, ¶6(e), page 7.*

The Applicant respectfully disagrees. Musafia describes a series of databases which may maintain collected or other data. *Musafia, ¶¶ [0031] – [0050].* None of these databases are described as including equipment information. There is no description in Musafia which even refers to equipment that may be on a production line, yet alone the collection of data about such equipment.

Lin does not cure this defect of Musafia. Lin discloses a real time measurement system to "monitor quantities of all check points in a production line; to calculate exact workman-hour during production; to measure all characteristic data; and then to convert the measurement data into analytical statistics." *Lin, Abstract, Page 57.* A review of Lin shows that

none of this data relates to equipment on the production line.

Szabados discloses a system to display the location and movement of automatic guided vehicles in real-time. *Szabados*, Page 35. The goal of the system is to identify bottlenecks at their onset as the plant is running. *Szabados*, Page 37. Using location data, the system processes numerical indicators such as average cycle time, job per hour rate, etc. *Szabados*, Page 35. Once again, there is no discussion in Szabados about the monitoring or collection of equipment information.

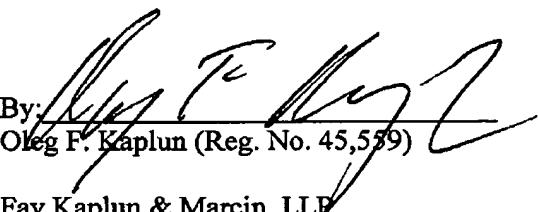
Thus, the applicant respectfully submits that Musafia, Lin and Szabados, either alone or in combination, do not teach or suggest “collecting real time equipment information from a production line” as recited in claim 18. Accordingly, applicant respectfully requests the Examiner to withdraw the rejection of claim 18 and all claims depending therefrom (19-24 and 34-42).

Independent claim 43 recites the same limitation as claim 18, i.e., “collecting real time equipment information.” Accordingly for the same reasons described above with respect to claim 18, the applicant respectfully requests the Examiner to withdraw the rejection of claim 43 and all claims depending therefrom (44-46).

CONCLUSION

In light of the foregoing, the Applicant respectfully submits that all of the pending claims are in condition for allowance. All issues raised by the Examiner have been addressed, an early and favorable action on the merits is earnestly solicited.

Respectfully submitted,

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